Message

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Sent: 11/6/2020 10:20:36 PM
To: Rao, Kate [Rao.kate@epa.gov]; Ho, Yenhung [Ho.Yenhung@epa.gov]
Subject: Notes of November 6, 2020 EPA-CES call

Hi Calvin and Kate.
Below are quick notes of today's call with CES. Please let me know if you have any additions or corrections.

EPA and Cadmus spoke to staff of CES and Schlumberger about the risk assessment performed for the CES Mendota project.

CES explained that they interpreted EPA's request for information about the anticipated severity of the event, mitigation measures, etc. as a request for a risk assessment. They shared their risk register spreadsheet that reflects site-specific information and operational triggers at the site, and asked a few questions:

- Does EPA need a qualitative or quantitative assessment?
- Does the register need to reflect how risk might change when a response occurs and/or the degree of success of risk responses?
- What is EPA's a preference for how risk is evaluated, e.g., should they use NRAP tools? (These tools use geomechanical data, fracture orientation, operational information, etc. to model the stress and expected seismic response associated with various injection pressures, and could be used to demonstrate that risk has been reduced or mitigated.)

EPA explained that specific comments on the risk assessment will come as part of EPA's review of the updated Emergency and Remedial Response Plan that CES submitted. Region 9 will discuss this with EPA Headquarters and provide feedback at a later date.

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